

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : CRIMINAL NO. 04-_____

v. : DATE FILED: _____

NING MEI : VIOLATIONS: 26 U.S.C. § 7206(1)
(False Tax Returns-
2 Counts)

INFORMATION

COUNT ONE

(26 U.S.C. § 7206(1))

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this information:

1. Defendant Ning Mei was President and owner of Zhen Cong Mei Fashions, Inc., ("Zhen Cong") a garment sewing business located at 1029-31 Race Street, in Philadelphia, Pennsylvania.
2. Defendant Ning Mei through the operations of Zhen Cong provided services as a sewing sub-contractor to various clothing manufacturers in the Philadelphia area and received payments for these services, often in the form of checks.
3. Defendant Ning Mei used check cashing agencies in Philadelphia and New York City to cash certain checks from Zhen Cong's customers totaling approximately \$366,560 for calendar years 1999 and 2000. These cash receipts were not deposited into the corporate bank accounts of Zhen Cong and were not otherwise recorded on the books and records of Zhen Cong as business receipts.

4. Defendant Ning Mei used cash funds to make wage payments "under the table" to employees of Zhen Cong totaling approximately \$366,560 for years 1999 and 2000, which resulted in federal employment/payroll taxes due and owing of approximately \$26,777.84 for 1999 and \$46,906.34 for 2000.

5. On or about April 15, 2000, in the Eastern District of Pennsylvania, defendant,

NING MEI,

a resident of Aston, Pennsylvania, willfully made and subscribed a U. S. Income Tax Return for an S Corporation, Form 1120S, for Zhen Cong Mei Fashions, Inc. for the calendar year 1999, which was verified by a written declaration that it was made under the penalties of perjury and was filed with the Internal Revenue Service, Philadelphia Service Center, Philadelphia, Pennsylvania, which return defendant Ning Mei did not believe to be true and correct as to every material matter in that the return reported gross receipts/sales in the amount of \$297,402 (Line 1a), and salaries and wages, in the total amount of \$98,132 (Line 8), when, in fact, as defendant Ning Mei well knew, Zhen Cong Mei Fashions Inc. had gross receipts/sales in addition to that stated, and salaries and wages in addition to that stated.

In violation of Title 26, United States Code, Section 7206(1).

COUNT TWO

(26 U.S.C. § 7206(1))

THE UNITED STATES ATTORNEY CHARGES THAT:

1. Paragraphs 1 through 4 of Count One are alleged as if fully restated.
2. On or about April 17, 2001, in the Eastern District of Pennsylvania, defendant

NING MEI,

a resident of Aston, Pennsylvania, willfully made and subscribed a U. S. Income Tax Return for an S Corporation, Form 1120S, for Zhen Cong Mei Fashions, Inc. for the calendar year 2000, which was verified by a written declaration that it was made under the penalties of perjury and was filed with the Internal Revenue Service, Philadelphia Service Center, Philadelphia, Pennsylvania, which return defendant Ning Mei did not believe to be true and correct as to every material matter in that the return reported gross receipts/sales in the amount of \$288,265 (Line 1a), and salaries and wages in the total amount of \$120,948 (Line 8), when, in fact, as defendant Ning Mei well knew, Zhen Cong Mei Fashions, Inc. had gross receipts/sales in addition to that stated, and salaries and wages in addition to that stated.

In violation of Title 26, United States Code, Section 7206(1).

PATRICK L. MEEHAN
United States Attorney
Eastern District of Pennsylvania

